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February 25, 2011

Via ECFS

Marlene Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Emerios Notice of Ex Parte Presentation – CC Docket No. 96-45, WC Docket No. 03-109

Dear Ms. Dortch:

On February 24, 2011, Jesse Crowe, CEO, and Ron Renjilian, Director Government Affairs, Emerios, and the undersigned met with Angela Kronenberg, Wireline Legal Advisor, for Commissioner Mignon Clyburn. The purpose of the meeting was to discuss the attached presentation, "Emerios' Lifeline Program Services." This presentation summarizes the views expressed by Emerios in its *ex parte* filing of January 4, 2011 regarding reforms to the federal Lifeline universal service program.

This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,

Thomas Cohen

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Counsel for Emerios

Attachment: Presentation -- Emerios' Lifeline Program Services, February 24, 2011

cc: A. Kronenberg

Lifeline Program Services Emerios'

Jesse Crowe, CEO February 24, 2011



Agenda

- Introduction to Emerios
- Proposed Lifeline Solution in response to Joint Board recomendations
 - Phase 1 Single Benefit Pre-Qualification
 - Phase 2 Automated Program Benefit
 Qualification and Verification
- Summary of Benefits



The Worldwide Leader

- Pioneer the of Message Broadcasting Industry
 - Authoritative leader in compliance with State & FTC regulations
 - Best record in the industry for state-by-state and HIPPA compliance
- Unmatched Experience
 - Founded in 1997, over 4 Billion+ Contacts...and counting
- Market Leading Intelligence Response Technologies
 - Emerios Acquisition & Response Services $^{\rm TM}$ database and response platform ensures superior customer experience
 - Storied history of innovation and development



VMBC/Emerios Distinctive Competencies

- 12 years of proven experience
- A Learning Organization with Technical Expertise
- Proven (Reference Available) Rapid Deployment for High Volume Lifeline Qualification
- Proven Expertise in Single Household Benefit
- All Processes, Systems and Technology is Owned by VMBC / Emerios
- Turn Key Capacity Ready to Engage and Rapidly Deliver
- Will pass the 5 million Cumulative Enrollment mark providing low income services through Lifeline this year



Emerios Lifeline Engagement Methodology

- Two phase approach
 - Single Benefit Pre-Qualification
 - Automated Program Benefit Qualification and Verification
- Neutral "non carrier based" third party
- Secure, independent and centralized national "ETC" database
- Low upfront cost, low risk willing to take a portion as a savings percentage during the initial period to incentivize a rapid roll-out.
- Rapid deployment (phase 1) within six months of contract
- Significant and quick projected return on investment for phase 1 (phase 2 optional for states) Positive flow prior to first payment.



Emerios Lifeline Engagement Methodology

Phase 1

Single Benefit Pre-Qualification

Secure, independent and centralized national ETC database.

Phase 2

Automated Program Benefit Qualification and Verification

Optional state automation efforts become simpler as they have to integrate to the national database not each ETC



Phase 1 - "Single Benefit Pre-Qualification"

- Secure, independent and centralized national "ETC" database
- All ETC's contribute to the database
- FCC sanctioned conversion process of duplicate households
- Would enable ETCs to verify the single household as a step in the enrollment process
- Pre- Qualification becomes a requirement for Lifeline services enrollment
- Phase I could be rapidly implemented
- Significant return on investment 3X plus is projected
- Emerios willing to implement on a fee plus performance basis to shoulder significant up front costs and have performance incentives for benefiting fund during 2011 calendar year.



Phase 2 - "Automated Program Benefit Qualification and Verification"

- Implementation of Phase II would be optional for each state
- State's still determine Lifeline program eligibility and qualification criteria
- For states that want to improve agency efficiency through automation
- State automation efforts become simpler as they have to integrate only to the national database not each ETC
- Reduces ETC enrollment and annual verification costs
- Promotes ETC outreach by improving efficiency and effectiveness



Summary of Benefits

- Emerios is a subject matter expert in Lifeline program processes for enrollment and verification – approx. 5 Million recipients enrolled to date
- A phased approach reduces program risk and cost
- Phase 1 return on investment projected to be significant and quick – significant savings to the fund this year
- Emerios has full team ready to move forward on an expedited basis and is willing to share risk with a hybrid fee / performance based model.
- Phase 1 is a critical building block for successful automation efforts in Phase 2 when states determine they are ready
- Improves program efficiency, and promotes ETC outreach

